

**CIRCULAR ECONOMY :**  
EXTERNAL POSITION BY A.I.S.E.,  
TO BE SUBMITTED AS INPUT TO THE EUROPEAN COMMISSION  
CONSULTATION MID 2015

*« A 'circular economy' aims to maintain the value of the materials and energy used in products in the value chain for the optimal duration, thus minimising waste and resource use. By preventing losses of values from material flows, it creates economic opportunities and competitive advantages on a sustainable business<sup>1</sup> ».*

A.I.S.E., the International Association for Soaps, Detergent and Maintenance products is the official representative body of this industry in Europe. Our membership totals 31 national associations across Europe and beyond. Through this network, we represent over 900 companies supplying both household and professional cleaning and maintenance products and services. These range from small and medium-sized enterprises to large multinationals.

Whether for household or for professional applications, the products sold by the detergents' and maintenance products industry play a critical role for society. They are essential to the proper maintenance of people's possessions, enabling them to last longer; this is already a key contribution to durability of goods. But also, these products have a proven positive effect on health by combating the spread of germs and thus, achieve the high living standards and life expectancy that people enjoy.

**The understanding of the detergents' and maintenance products industry is that Circular Economy comes as a complement to the long-standing Resource Efficiency and Corporate Social Responsibility agendas developed by the European Institutions. Altogether, these three elements should help society progress towards a truly sustainable development.**

**Whilst a lot of sustainability progress has already been delivered by our Industry over the last decades through voluntary actions, our sector is keen to embrace the new opportunities brought by the concept of Circular Economy. By working constructively and proactively with our value chain on such priorities, this should help further steer tangible progress, enabling greater innovation and competitiveness of the EU industry.**

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<sup>1</sup> Abstract from European Commission's public consultation on the Circular Economy, 2015

## 1) Voluntary action at sectoral level: a key enabler to drive progress towards resource efficiency, circular economy and sustainability

A.I.S.E. has been extremely proactive since the last 2 decades in steering proactively the sustainable development agenda within its sector. This is being done through key voluntary projects, developed thanks to the expertise of the sector, in consultation with stakeholders. Those projects have been tackling topics related to resource efficiency and sustainability—two concepts which for us, go hand in hand with circular economy. This is the case of the A.I.S.E. Charter for Sustainable Cleaning<sup>2</sup> which was set up 10 years ago and which gathers now more than 200 companies of the sector towards high level sustainability standards and savings for the sector (see overview in Annex). Other initiatives such as the Product Resource Efficiency Projects or other initiatives to promote the sustainable consumption of products have delivered greatly. **We strongly invite the European Commission and related stakeholders to continue acknowledging and encouraging – via an adequate framework – the very valuable role that voluntary initiatives and self regulation at sectoral level (or across sectors) can have to advance the circular economy thinking and overall sustainable development agenda into tangible actions, and are keen to share our experiences.**

## 2) Circular economy, production phase in the detergent sector

Since the early 1900's the manufacture of products that help consumers and professional customers benefit from high levels of cleanliness and hygiene have been mostly based on the availability of chemical ingredients from fossil origins. Those chemical ingredients are subject to a broad spectrum of regulatory requirements (cf REACH, CLP, biocides regulations etc), to guarantee that products placed on European market are safe for man and the environment.

Whilst some sources of **renewable or bio-based origins** are being currently developed, A.I.S.E. sees further opportunities for securing a reliable sourcing and supply of renewable raw materials (for both ingredients and packaging). The detergents' and maintenance products industry considers that these should be reliable in terms of :

- **quality** to deliver the expected performance,
- but also in terms of **quantity** to be able to meet the demand in the long term.

**We see opportunities for greater collaboration on these matters, securing that such resources present not only environmental benefits but are also economically and socially viable.**

## 3) Engaging consumers on sustainable consumption and circular thinking: a critical success factor

In our sector, in addition to the efforts made by manufacturers towards more sustainable products design, the consumer has a very critical role to play in order to help lower the environmental footprint (eg using the adequate dosage, filling of the machine, washing at low temperatures etc). **We see education of consumers as a critical element to be taken into account when developing Circular Economy models; but we are also aware as to how challenging changing consumer habits is. In this context, the role of multi-stakeholder campaigns can be a powerful tool in helping drive such changes consistently.** Several examples of such campaigns have been organised by A.I.S.E. with the participation of other key stakeholders (eg [www.iprefer30.eu](http://www.iprefer30.eu)), and we continue to see further opportunities to engage in education of consumers, particularly with our value-chain partners (eg textile, appliances, professional customers).

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<sup>2</sup> [www.sustainable-cleaning.com](http://www.sustainable-cleaning.com)



#### 4) Circular economy, waste and the detergent sector

The packaging materials in our sector are using more and more plastic. In addition, we also make use of cardboards or paper for certain product categories. We recognise the immense potential in increasing the uptake of secondary packaging raw materials. However, the availability and quality of recycling infrastructures is currently simply not present in a harmonised way across EU Member States. To date, the market for secondary raw materials is limited because of the lack of availability for such materials, lack of EU quality standards and the existing cost differential between virgin and secondary raw materials. Competition with other sectors that make use of secondary raw materials (eg. food) should also be addressed.

**Greater cooperation between the suppliers, the users, the consumers, and the authorities and the recycling industries should be looked at in order to ensure the uptake of recycled packaging materials.**

On the issue of Extended Producer Responsibility (EPR), A.I.S.E. supports the introduction at EU level of clear minimum requirements for EPR schemes. A.I.S.E. also considers that implementation and enforcement of EU waste and packaging legislation is a pre-requisite<sup>3</sup>.

As a complementary note to this chapter, we also see opportunities for further clarification between REACH and the waste legislation (defined in the Waste Framework Directive). Indeed, as recently debated in a CARACAL meeting<sup>4</sup>, there are fears that REACH controls (in their current form), would impede recycling including remanufacturing as they impose now that recovered materials are once more subject to REACH. **Opportunities between REACH and the waste legislations should be found to ease and thus stimulate a circular economy of such ingredients.**

#### 5) From “product” to “service”: a concept already applied in the Professional Cleaning and Hygiene sector

Cleanliness and hygiene are essential factors for consumers in their homes, but also for professionals in hospitals, public transports, HORECA, etc. In A.I.S.E., the Professional and Hygiene sector (PC&H) accounts for nearly 20% of the turnover value of A.I.S.E. members and counts a broad number of SMEs. **Particularly to this sector, the concept of “service” – which is key to the circular economy thinking - is already at the heart of their business model and delivers efficient optimal solutions.** It allows for example professional customers to use the right dosage of the most appropriate product, taking care of the workers' safety.

#### 6) Thinking across the value chain: experiences and further potentials. The value of industry associations work in complement to companies' activities

Circular Economy also has at the heart of its principles “cross value-chain collaboration”. A.I.S.E., through its pan-European umbrella network has been cooperating for a number of years with other associations and partners in the value-chain. We welcome the strong emphasis given to such collaborations, so as to allow companies to develop the new business solutions that could emerge from such a collective thinking. A.I.S.E. benefits from a vast experiences of collaboration across the value chain, notably with its chemicals suppliers, but also with retailers, textile, appliance sectors as shown from the list in Annex.

**We are keen to capitalise on this experience and discuss with relevant partners the opportunities to progress further the circular economy and sustainable developments agendas altogether in a proactive and constructive way.**

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<sup>3</sup> See EUROPEN position

<sup>4</sup> 18th meeting of Competent Authorities for REACH and CLP (CARACAL), 23-24 June 2015



ANNEX:

## An overview of A.I.S.E.'s voluntary initiatives

Through our various initiatives we have taken measures to ensure that both the industry and the consumer abide by the principle of 'shared responsibility'. This means that just as our industry contributes to sustainable production practices in the sourcing and manufacturing of products, consumers can also contribute by supporting sustainable consumption practices in the use and disposal of their product.

Below is an overview of A.I.S.E.'s voluntary initiatives which promote the sustainable production and sustainable consumption of our products.

		SUSTAINABLE PRODUCTION	SUSTAINABLE CONSUMPTION
1997 2002	<b>CODE OF GOOD ENVIRONMENTAL PRACTICE</b> The 'Code of Good Environmental Practice' ('the Code') was the first major voluntary initiative by A.I.S.E. specifically designed for household laundry detergents.		
1997 →	<b>WASHRIGHT® / BEST USE PANELS</b> Initially developed in the context of the Code, Washright is a pan-European awareness-raising campaign to promote good washing practices to consumers when doing the laundry. Since then, A.I.S.E. has released a number of best use panels for on pack use to promote sustainable use of cleaning products. <a href="http://www.cleanright.eu">www.cleanright.eu</a>		
1999 2004	<b>HERA (Human and Environmental Risk Assessment on Ingredients of Household Cleaning Products)</b> A joint A.I.S.E./Cefic initiative, five years ahead of REACH. <a href="http://www.heraproject.com">www.heraproject.com</a>		
2001 →	<b>DUCC (Downstream Users of Chemicals Co-ordination group)</b> A platform to address REACH's objectives. <a href="http://www.duccplatform.org">www.duccplatform.org</a>		
2004 →	<b>CHARTER FOR SUSTAINABLE CLEANING</b> Promoting a life-cycle approach to sustainability through independent assessment, with annual reporting. Updated in 2010 with additional product specific requirements. <a href="http://www.sustainable-cleaning.com">www.sustainable-cleaning.com</a>		
2005 →	<b>SAFE USE ICONS</b> A harmonised set of icons and sentences for voluntary, proactive use by companies to help consumers use products in a safe way. <a href="http://www.cleanright.eu">www.cleanright.eu</a>		
2006 →	<b>PRODUCT RESOURCE EFFICIENCY PROJECTS</b> Educating consumers to dose concentrated laundry detergents correctly. <a href="http://www.aise.eu/preps">www.aise.eu/preps</a>		
2007 →	<b>PRODUCT STEWARDSHIP PROGRAMMES</b> Air Fresheners 2007: an initiative to promote responsible manufacturing, communication and use of Air Fresheners <a href="http://www.aise.eu/airfresheners">www.aise.eu/airfresheners</a> Gel Capsules 2012: an initiative to secure safe use and storage by consumers of liquid laundry detergent capsules. <a href="http://www.aise.eu/capsules">www.aise.eu/capsules</a>		
2008 →	<b>WWW.CLEANRIGHT.EU</b> A joint Cefic and A.I.S.E. industry website initiative providing consumers across Europe with information and advice on the safe and sustainable use of soaps, detergents and maintenance products. <a href="http://www.cleanright.eu">www.cleanright.eu</a>		
2013 →	<b>I PREFER 30°</b> A unique multi-stakeholder campaign by the detergent industry to drive low temperature washing, in partnership with retailers, appliance manufacturers and fashion houses. <a href="http://www.iprefer30.eu">www.iprefer30.eu</a>		
2014 →	<b>A.I.S.E. INDUSTRIAL &amp; INSTITUTIONAL APPLICATION PICTOGRAMS</b> A set of Industrial & Institutional application pictograms (kitchen & catering, food & beverage, building care) designed to optimise the correct and efficient use of professional cleaning and care products. <a href="http://www.aise.eu/professionaluseractivities">www.aise.eu/professionaluseractivities</a>		
2014 →	<b>KEEP CAPS FROM KIDS</b> A consumer education campaign that aims at securing the safe use and storage of liquid laundry detergent capsules to reduce significantly the incidents involving small children due to accidental exposure to these products. <a href="http://www.keepcapsfromkids.eu">www.keepcapsfromkids.eu</a>		

**For any further question, please contact at A.I.S.E.:**

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